

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DEUTSCHE BANK NATIONAL TRUST §
COMPANY, AS TRUSTEE FOR §
MORGAN STANLEY ABS CAPITAL I §
INC. TRUST 2003-HE2 MORTGAGE §
PASS-THROUGH CERTIFICATES, §
SERIES 2003-HE2,

Plaintiff,

v.

GLEENDA HINOJOSA AND ROY
HINOJOSA,

Defendants.

Civil Action No. 5:19-cv-588

DECLARATION OF MARK D. CRONENWETT

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the following statements are true and correct:

1. "My name is Mark D. Cronenwett. I am over the age of 21 years and am fully competent to make this Declaration. All statements of fact made herein are true, correct, and within my personal knowledge.

2. I am an attorney for Plaintiff Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2003-HE2 Mortgage Pass-Through Certificates, Series 2003-HE2 ("Plaintiff").

3. Plaintiff filed its *Original Complaint* ("Complaint") in this action on May 31, 2019 (ECF Doc. No. 1.)

4. I am an attorney licensed to practice in the State of Texas and am a member of the bar of the United States District Court for the Western District of Texas. I am currently

managing attorney for the litigation department of the law firm of Mackie Wolf Zientz & Mann, P.C. (MWZM), with offices located in Dallas, Texas and Houston, Texas. I am in good standing with respect to the State Bar of Texas. A true and correct copy of my resume is attached hereto as Exhibit A-1.

5. MWZM was retained by Plaintiff to file this lawsuit to enforce Plaintiff's interest in certain real property as a result of a default under the loan agreement. The legal professionals of MWZM with whom I worked in providing these services are at all relevant times attorneys licensed by the State of Texas, in good standing and experienced in the areas of business, real estate, and commercial litigation practice. Without waiving the attorney-client privilege, the subject matter of the counsel and representation provided to Plaintiff by MWZM legal professionals included, but was not limited to: review and analysis of the loan documents at issue; review and analysis of the history of this matter; preparation and filing of the original complaint; completing service; drafting a request for entry of default; drafting a motion for default judgment; conducting legal research; and multiple conferences with Plaintiff's mortgage servicer regarding all of these items and this matter generally. These activities are set forth in chronological order by name and date on the invoices included with the motion as Exhibit A-2.

The hours set forth for each activity were actually expended on the topics stated.

6. The reasonable incurred attorneys' fees are \$9,784.50 in filing and prosecuting its Plaintiff's claims to enforce its interest in certain real property as a result of the default under the loan agreement between the parties. The hourly rate charged is \$215.00 per hour for attorneys and \$95.00 per hour for paralegals and legal assistants.

7. I have become familiar with the legal services necessary to handle claims based on and the reasonable charges for such legal services in the United States District Court for the Western District of Texas and within the State of Texas.

8. In considering reasonable attorneys' fees in this case, I have considered the time and labor involved; the difficulty of the issues presented; the experience, reputation, and ability of the attorneys involved in pursuing the claims; the skills requisite to properly conduct the case; customary charges of the Bar and awards in similar cases; and the amount in controversy.

9. Based upon my knowledge and experience with similar litigation in the state and federal courts in Texas over the last ten years, and applying the facts and factors set out above, it is my opinion that the hourly rate of up to \$215.00 per hour for attorneys and \$95.00 per hour for paralegals and legal assistants are reasonable and customary, and the sum of \$9,784.50 is reasonable attorneys' fees for prosecuting Plaintiff's claims for the enforcement of its interest in certain real property as a result of a default under the loan agreement.

10. If any party files post-judgment motion, a reasonable fee for Plaintiff would be \$2,500.00. If this case is appealed to the Fifth Circuit Court of Appeals, a reasonable fee for the Plaintiff would be an additional \$5,000.00."

FURTHER DECLARANT SAYETH NAUGHT.

Signed this September 15, 2020.



MARK D. CRONENWETT

EXHIBIT A-1

MARK D. CRONENWETT

14160 N. Dallas Parkway, Suite 900 • Dallas, Texas 75254 • (214) 635-2650

PROFESSIONAL EXPERIENCE

Mackie Wolf Zientz & Mann, P.C., Dallas, Texas, 10/12-present

Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

Higier Allen & Lautin, P.C., Addison, Texas, 1/09-10/12

Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

Cowles & Thompson, P.C., Dallas, Texas, 9/99-1/09

I was an associate until I was made a Shareholder in December 2000. Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

Fanning, Harper & Martinson, P.C., Dallas, Texas 9/98-9/99

I was an associate in the firm's governmental defense section. Practice areas: defense of governmental entities in civil rights and employment cases. My duties included sitting second chair at trial; drafting and answering discovery; drafting and arguing all varieties of motions; drafting appellate briefs; and attending mediations.

Kuntz & Bonesio, L.L.P., Dallas, Texas 6/97-9/98

I was a litigation associate. Practice areas: commercial litigation, general insurance defense, employment law, and insurance subrogation. My duties included sitting second chair at trial; drafting and answering discovery, drafting and arguing all varieties of motions.

Texas Court of Appeals, Tenth District, Waco, Texas, 10/94-6/97

I was a briefing attorney for Judge Bob Cummings until July 1996 when I was hired as Judge Cummings' permanent staff attorney. I was the principal legal advisor to Judge Cummings; researched and drafted opinions in complex appeals; consulted with other judges on reconciling differences on the correct application of law; prepared drafts of opinions reconciling differences; led discussions of cases at court conferences; supervised interns and more junior legal staff; and handled the Court's motions docket.

Texas Employment Commission, Austin, Texas 1/94-10/94

I was a hearing officer, presiding over administrative hearings concerning unemployment compensation and issued written opinions.

EDUCATION

Juris Doctorate, 5/93

Catholic University of America, Washington D.C.

Associate Moot Court member, 1/91-5/93

Finalist, Dean's Cup Moot Court Competition, 3/91

President and Secretary of Guild of Catholic Lawyers, 5/91-5/93

B.A. in English Literature, concentrating in Politics, 5/90
University of Dallas, Irving, Texas

PROFESSIONAL
ASSOCIATIONS

Admitted to Texas State Bar, Fifth Circuit, and all Texas Federal District Courts; Member of the Dallas Bar Association; Consumer Law and Civil Appellate Sections of the Texas Bar; Federal Bar Association; Immediate Past President, St. Thomas More Society; Pro Bono Counsel to White Rose Women's Center

EXHIBIT A-2

Invoice Date
12/26/2018

Invoice Number
██████████

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

Ocwen Loan Servicing
 1661 Worthington Road, Suite 100
 West Palm Beach, FL 33409

Loan No: ██████████

Reference:

Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

Loan Type: CONV; Case Type: Litigation

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
12/11/2018	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Review new matter.					
12/12/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$215.00	0.80	\$172.00
Conducted initial review of file for referral to conduct judicial foreclosure.					
12/13/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$215.00	0.10	\$21.50
Reviewed file to determine whether necessary notices have been provided.					
12/13/2018	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.40	\$38.00
Paralegal Fee-Hourly					
12/14/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$215.00	0.20	\$43.00
Reviewed the change in status of the foreclosure file and assessed future action.					
12/20/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$215.00	0.20	\$43.00
Reviewed file for foreclosure status change and assessed future action.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$403.50
Current Amount Due	\$403.50
Payments Received	\$0.00
Total Amount Due	\$403.50

Invoice Date
04/03/2019

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

Ocwen Loan Servicing
 1661 Worthington Road, Suite 100
 West Palm Beach, FL 33409

Loan No: [REDACTED]

Reference:

Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

Loan Type: CONV; Case Type: Litigation

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
12/26/2018	Paralegal Fee-Hourly- Recoverable Escobedo, Rosalie	Yes	\$95.00	0.20	\$19.00
Worked attorney review step and reviewed the case for the purpose of moving the file forward.					
02/04/2019	Paralegal Fee-Hourly- Recoverable Escobedo, Rosalie	Yes	\$95.00	0.20	\$19.00
Reviewed case status for the purpose of moving the file forward.					
02/04/2019	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Research to confirm status of loan mod					
02/14/2019	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$215.00	0.20	\$43.00
Reviewed file for change in foreclosure status and assessed next steps.					
03/19/2019	Paralegal Fee-Hourly- Recoverable Taplin, Susan	Yes	\$95.00	0.50	\$47.50
Conduct military and bankruptcy searches on Glenda and Roy Hinojosa now that MOD hold has been removed and proceed instructions were received					
03/19/2019	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$215.00	0.20	\$43.00
Reviewed file for change in foreclosure status and assessed next steps.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$190.50
Current Amount Due	\$190.50
Previous Balance	\$403.50
Payments Received	\$403.50
Total Amount Due	\$190.50

Invoice Date
04/30/2019

Invoice Number
[REDACTED]

Mackie Wolf Zientz & Mann, P.C.
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 Fax: (214) 635-2686

INVOICE

Ocwen Loan Servicing
 1661 Worthington Road, Suite 100
 West Palm Beach, FL 33409

Loan No: [REDACTED]

Reference:

Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

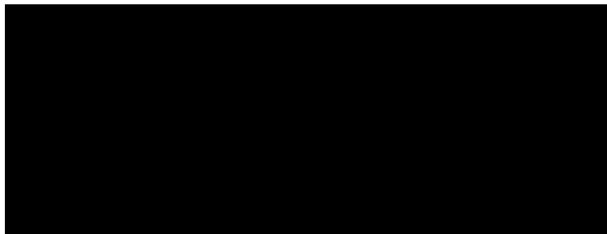
Loan Type: CONV; Case Type: Litigation

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
04/18/2019	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$215.00	0.20	\$43.00
Reviewed file to prepare transition materials.					
04/19/2019	Paralegal Fee-Hourly- Recoverable Escobedo, Rosalie	Yes	\$95.00	0.20	\$19.00
Reviewed case status for the purpose of moving the file forward.					
04/24/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Researched matter for any upcoming deadlines and next steps. Original petition has yet to be drafted.					
04/26/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.50	\$107.50
Review file notes to determine status of hold - removed - proceed with drafting complaint.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$217.00
Current Amount Due	\$217.00
Previous Balance	\$594.00
Payments Received	\$594.00
Total Amount Due	\$217.00



Invoice Date
05/15/2019

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

Ocwen Loan Servicing
 1661 Worthington Road, Suite 100
 West Palm Beach, FL 33409

Loan No: [REDACTED]

Reference:

Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

Loan Type: CONV; Case Type: Litigation

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
05/08/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.40	\$86.00
Review loan documents in preparation for drafting original complaint.					
05/08/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	1.00	\$215.00
Draft plaintiff's original complaint.					
05/08/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.40	\$86.00
Prepare exhibits to be attached to plaintiff's original complaint.					
05/08/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Prepare certificate of interested parties.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$451.50
Current Amount Due	\$451.50
Previous Balance	\$811.00
Payments Received	\$811.00
Total Amount Due	\$451.50



Invoice Date
05/29/2019

Invoice Number
██

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

Ocwen Loan Servicing
 1661 Worthington Road, Suite 100
 West Palm Beach, FL 33409

Loan No: ██████████

Reference:

Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

Loan Type: CONV; Case Type: Litigation

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
05/20/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee review notice in change in foreclosure status.	Yes	\$95.00	0.20	\$19.00
05/21/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin Review file - pending preparation of exhibits for filing of petition.	Yes	\$215.00	0.20	\$43.00
05/23/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee Requested current payoff figures good through 30 days.	Yes	\$95.00	0.60	\$57.00
05/28/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee Receipt and review current payoff figures. Notified attorney.	Yes	\$95.00	0.50	\$47.50
05/28/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin Evaluate payoff quote	Yes	\$215.00	0.20	\$43.00
05/28/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin Finalize original complaint with payoff information and request preparation for filing.	Yes	\$215.00	0.20	\$43.00

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$252.50
Current Amount Due	\$252.50
Previous Balance	\$1,262.50
Payments Received	\$1,262.50
Total Amount Due	\$252.50

Invoice Date
06/18/2019

Invoice Number
██

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: ██████████

Reference:

Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

Loan Type: CONV; Case Type: Litigation

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
05/31/2019	Court Costs for filing federal complaint.- Recoverable	Yes	\$400.00

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
05/30/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	1.10	\$104.50
Prepared and redacted exhibits in support of Original Complaint.					
05/30/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Drafted request for Summons on both Defendants.					
05/30/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Prepared request for summons in support of Original Complaint.					
05/31/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Prepared Original Complaint and supporting documents for federal filing.					
05/31/2019	Paralegal Fee-Hourly- Recoverable Cruz, Alma	Yes	\$95.00	0.20	\$19.00
Drafted and prepared civil cover sheet for complaint filing.					
05/31/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review documents for filing.					
05/31/2019	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review and revise complaint					

TOTALS

DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$400.00
Total Hourly Fees Since Last Billing	\$314.00
Grand Total	\$714.00

Invoice Date
06/27/2019

Invoice Number
██

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: ██████████

Reference:

Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

Loan Type: CONV; Case Type: Litigation

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
06/19/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review file for status - inquire about status of process on defendants.					
06/19/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.40	\$38.00
Receipt and review issued summons for defendants Roy and Glenda Hinojosa					
06/19/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Correspondence requesting service of summons on both defendants Roy and Glenda Hinojosa.					
06/24/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Review and confirm completion of personal service by process server on defendant Glenda Hinojosa.					
06/24/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Review and confirm completion of personal service by process server on defendant Roy Hinojosa					
06/25/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review for status of service.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$209.50
Current Amount Due	\$209.50
Previous Balance	\$2,229.00
Payments Received	\$1,515.00
Total Amount Due	\$923.50

Invoice Date
07/22/2019

Invoice Number
[REDACTED]

Mackie Wolf Zientz & Mann, P.C.
14160 N. Dallas Pkwy Ste. 900
Dallas, TX 75254
Phone: (214) 635-2650
Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
1Mortgage Way
Mail Stop SV-22
Mt. Laurel, NJ 08054

Loan No: [REDACTED]

Reference:

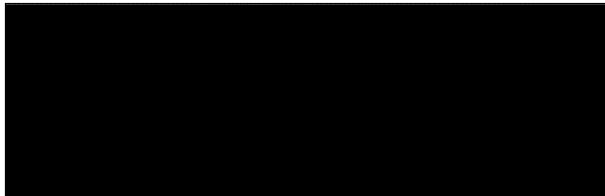
Property Addr: 7505 LEADING OAKS STREET
LIVE OAK, TX 78233
Our File: 18-001136-670-2

Loan Type: CONV; Case Type: Litigation; Filing Date: ; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
07/02/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.40	\$38.00
Receipt and review file stamped return of service from process server for both Defendants Glenda and Roy Hinojosa.					
07/09/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to correspondence regarding rule 11 agreement with borrower to extend deadline to respond by 30-days.					
07/09/2019	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Telephone conference with borrower regarding his desire for loss mitigation and agreement to extend answer deadline					
07/18/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Review matter and provided details request for foreclosure hold request.					
07/18/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to correspondence from foreclosure.					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$229.00
Current Amount Due	\$229.00
Previous Balance	\$2,438.50
Payments Received	\$1,515.00
Total Amount Due	\$1,152.50



Invoice Date
08/23/2019

Invoice Number
██

Mackie Wolf Zientz & Mann, P.C.
14160 N. Dallas Pkwy Ste. 900
Dallas, TX 75254
Phone: (214) 635-2650
Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
1Mortgage Way
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Mt. Laurel, NJ 08054

Loan No ██████████

Reference:

Property Addr: 7505 LEADING OAKS STREET
LIVE OAK, TX 78233
Our File: 18-001136-670-2

Loan Type: CONV; Case Type: Litigation; Filing Date: ; Chapter: NO

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
06/22/2019	Process Server Costs- Recoverable	Yes	\$169.50
06/22/2019	Process Server Costs- Recoverable	Yes	\$109.50

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
07/22/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review for status of MDJ for defendants. July 12 plus 30 day extension -> August 11.					
07/31/2019	Paralegal Fee-Hourly- Recoverable Escobedo, Rosalie	Yes	\$95.00	0.20	\$19.00
Review case status for the purpose of moving the file forward.					
07/31/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to completing correspondence regarding defendant in loss mitigation and agreed extension for an answer.					
08/02/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.10	\$21.50
Calendar reminder to prepare motion for summary judgment.					
08/12/2019	Paralegal Fee-Hourly- Recoverable Schmidt, Rathikane	Yes	\$95.00	0.30	\$28.50
Review of scorecard rebuttal for service of process, updated service complete date and rebuttal. Forwarded to compliance for review.					
08/12/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.80	\$172.00
Prepare motion for default judgment and proposed order.					
08/14/2019	Senior Attorney Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review military and bankruptcy search results.					

TOTALS

DESCRIPTION	AMOUNT
Total Costs - Summary Judgment Billing	\$670.00

Invoice Date
09/10/2019

Invoice Number
██

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
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INVOICE

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Loan Type: CONV; Case Type: Litigation; Filing Date: ; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
08/12/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.40	\$86.00
Prepare declaration of military status and service.					
08/12/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.70	\$150.50
Prepare request for clerk's entry of default and proposed order.					
08/13/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Attention to case status update for next steps in litigation.					
08/14/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Requested military and bankruptcy searches.					
08/14/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Prepared exhibits in support of Motion for default.					
08/14/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review default documents prepared for filing.					
08/15/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared Motion for default and supporting documents for filing.					
08/15/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review correspondence regarding an extension for defendant's response.					
08/15/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.60	\$57.00
Drafted Motion to withdraw default. Submitted to attorney for review.					
08/15/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Attention to correspondence regarding extension of deadline to file an answer.					

08/15/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Telephone conference with borrower regarding status of loss mitigation and agreement to provide him with two weeks to answer					
08/16/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review for status of loan modification.					
08/20/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review reinstatement figures.					
08/20/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Drafted Reinstatement figures and prepared letter.					
08/28/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review order granting motion to withdraw.					
08/28/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review court's order granting motion to withdraw.					
08/28/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review order of withdrawal					
08/30/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$95.00	0.30	\$28.50
Telephone conference with Roy Hinojosa regarding the reinstatement quote he received and the letter of denial on the loan modification from PHH					
09/02/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to voicemail from Defendant #210.840.2349					
09/04/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review file and prepare case status update for next steps in litigation.					
09/06/2019	Paralegal Fee-Hourly-Recoverable Escobedo, Rosalie	Yes	\$95.00	0.10	\$9.50
Reviewed case status for the purpose of moving the file forward.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$1,090.00
Current Amount Due	\$1,090.00
Previous Balance	\$3,299.50
Payments Received	\$3,299.50
Total Amount Due	\$1,090.00



Invoice Date
11/18/2019

Invoice Number
██████████

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: ██████████

Reference:

Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

Loan Type: CONV; Case Type: Litigation; Filing Date: ; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
09/13/2019	Associate Attorney Fee-Hourly- Recoverable Smith, Jonathan	Yes	\$215.00	0.20	\$43.00
Reviewing status of file for borrower's reinstatement of loan.					
09/24/2019	Associate Attorney Fee-Hourly- Recoverable Smith, Jonathan	Yes	\$215.00	0.20	\$43.00
Reviewing status of settlement.					
10/04/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review payoff request.					
10/04/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Prepared Payoff statement.					
10/04/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review reinstatement request.					
10/04/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Prepared reinstatement letter.					
10/08/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Receipt and review request for payoff.					
10/08/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt an review payoff figures.					
10/08/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Prepared Payoff statement.					
10/09/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review approved pay off figures.					

10/09/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to status of loss mitigation hold.					
10/14/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to completing correspondence regarding pending reinstatement per mr. Hinojosa.					
10/15/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.40	\$38.00
Telephonic correspondence regarding payoff figures submitted via fax on October 8th.					
10/17/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Requested additional payoff figures.					
10/17/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Additional correspondence regarding pending payoff quote with Mr. Hinojosa.					
10/18/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review current payoff figures.					
10/18/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Prepared Payoff statement.					
10/18/2019	Senior Attorney Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Telephonic correspondence regarding payoff statement being emailed and mailed to borrower.					
10/18/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review file to determine if borrower has reinstated loan/paid off debt.					
10/30/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review Order for Discovery submitted by the court.					
10/30/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Submit correspondence to borrower regarding court's order to proceed with case and seeking status of loan payoff.					
10/31/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
receipt and review upcoming discovery deadlines.					
11/01/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Telephonic conversation with Roy Hinojosa.					
11/01/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Correspondence requesting reinstatement figures.					
11/01/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Correspondence requesting current payoff figures.					
11/05/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
receipt and review current payoff figures.					
11/05/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review reinstatement figures.					
11/05/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Prepared payoff statement.					

11/07/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Prepare advisory to the court.					
11/15/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review status of reinstatement.					
11/18/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to case status report.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$1,147.50
Current Amount Due	\$1,147.50
Previous Balance	\$4,389.50
Payments Received	\$4,389.50
Total Amount Due	\$1,147.50



Invoice Date
12/16/2019

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]

Reference:

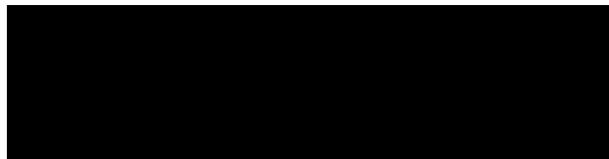
Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

Loan Type: CONV; Case Type: Litigation; Filing Date: ; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
11/24/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.10	\$21.50
Review for status of reinstatement.					
12/04/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Follow up with borrower.					
12/04/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review matter for steps completed and attention to next steps in litigation.					
12/05/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Telephone call from borrower regarding status of loan.					
12/05/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Submit correspondence to confirm loan modification.					
12/11/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Follow up on status verification of loan modification application.					
12/11/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.10	\$21.50
Attention to status report.					
12/11/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Submit denial letter to borrower.					
12/12/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Receipt and review loss mitigation hold. notified attorney.					
12/12/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to correspondence from foreclosure.					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$458.50
Current Amount Due	\$458.50
Previous Balance	\$5,537.00
Payments Received	\$4,389.50
Total Amount Due	\$1,606.00



Invoice Date
01/24/2020

Invoice Number
██

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INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: ██████████

Reference:

Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

MWZM Case No.: 18-001136-670-2; Loan Type: CONV; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
12/18/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review status of hold.					
12/26/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Submit follow up to Mr. Hinojosa.					
12/31/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review file, notes, status and prepare case report for next step in litigation.					
01/09/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Correspondence to borrower to follow up on loan modification/reinstatement/payoff.					
01/14/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to status of loss mitigation hold.					
01/16/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.40	\$38.00
Review and correspond regarding loss mitigation appeal period.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$274.50
Current Amount Due	\$274.50
Previous Balance	\$5,995.50
Payments Received	\$5,995.50
Total Amount Due	\$274.50

Invoice Date
04/17/2020

Invoice Number

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INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]

Reference:

Property Addr: 7505 LEADING OAKS STREET
 LIVE OAK, TX 78233
 Our File: 18-001136-670-2

MWZM Case No.: 18-001136-670-2; Loan Type: CONV; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
01/29/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review file, notes, and prepare case status update for next steps in litigation.					
02/05/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to case status report.					
02/19/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Check status of loss mitigation workout.					
02/21/2020	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange electronic correspondence with court clerk regarding status of loss mitigation.					
02/23/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review judge's comments regarding status of case.					
02/23/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Prepare advisory for the court and request filing..					
02/24/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared advisory to the court for filing.					
02/26/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review executed order.					
02/27/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review court's order administratively closing the case in light of loss mitigation.					
02/27/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.10	\$21.50
Attention to inventory report.					

03/12/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to status report.					
03/20/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Check status of loss mitigation.					
03/26/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.40	\$86.00
Prepare chronology of foreclosure and litigation events.					
03/30/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review case, deadlines, status of litigation, and prepare notes for next steps.					
04/02/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to status report.					
04/02/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Review matter to confirm hold removal.					
04/03/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.80	\$172.00
Draft motion to re-open case and reconsider motion for default judgment and proposed order.					
04/03/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$95.00	0.10	\$9.50
Review client system to determine if any holds are in place prior to filing motion to reopen matter and reconsider motion for default judgment					
04/03/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$95.00	0.20	\$19.00
Finalize motion to reopen case and reconsider motion for default judgment					
04/03/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$95.00	0.20	\$19.00
Prepare correspondence to borrowers serving the motion to reopen the case and reconsider the motion for default judgment					
04/03/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$95.00	0.40	\$38.00
Conduct military and bankruptcy searches on Roy and Glenda Hinojosa prior to filing motion to reopen case and reconsider motion for default judgment					
04/09/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review court's order granting motion to re-open and re-consider motion for default judgment.					
04/16/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to status report.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$1,131.50
Current Amount Due	\$1,131.50
Previous Balance	\$6,270.00
Payments Received	\$6,270.00
Total Amount Due	\$1,131.50

Invoice Date
06/26/2020

Invoice Number
██

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Phone: (214) 635-2650
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INVOICE

PHH Mortgage Corporation
1Mortgage Way
Mail Stop SV-22
Mt. Laurel, NJ 08054

Loan No: ██████████

Reference:

Property Addr: 7505 LEADING OAKS STREET
LIVE OAK, TX 78233
Our File: 18-001136-670-2

MWZM Case No.: 18-001136-670-2; Loan Type: CONV; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
04/22/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Attention to completing review for aged project.					
04/23/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review clerk's entry of default against defendants.					
04/28/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
receipt and review executed order denying Motion for default Judgment. notified attorney.					
04/28/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review judge's stipulations on motion for default judgment.					
05/05/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to completing correspondence regarding pending order.					
05/08/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review case and notes to prepare status report for next steps in litigation.					
05/25/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review status of loan - prepare affidavit and submit to client for execution .					
06/18/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review court's request for supplemental documentation in preparation for drafting motion to reconsider default judgment.					
06/18/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.80	\$172.00
Draft affidavit to prove up standing and submit for preparation for submission for execution.					
06/18/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	1.30	\$279.50

Prepared return of service on both defendants for federal filing.					
06/19/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review status of service.					
06/23/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Drafted cover letter in reference to affidavit in support of Motion for default.					
06/23/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.60	\$57.00
prepared and redacted exhibits in support of affidavit for execution.					
06/23/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review documents prepared for client execution.					
06/25/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
revised exhibits and supporting documents for client review.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$1,047.50
Current Amount Due	\$1,047.50
Previous Balance	\$7,401.50
Payments Received	\$7,401.50
Total Amount Due	\$1,047.50



Invoice Date
07/31/2020

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
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Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
1Mortgage Way
Mail Stop SV-22
Mt. Laurel, NJ 08054

Loan No: [REDACTED]

Reference:

Property Addr: 7505 LEADING OAKS STREET
LIVE OAK, TX 78233
Our File: 18-001136-670-2

MWZM Case No.: 18-001136-670-2; Loan Type: CONV; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
06/26/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review affidavit documents, obtain new copy of deed of trust and re-submit for preparation					
07/03/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review status of litigation and prepare notes for next steps.					
07/07/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to exhibit revisions. notified attorney.					
07/07/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review documents prepared for submission to client.					
07/07/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Submitted documents for client review and execution in support our Motion to reconsider.					
07/21/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review executed affidavit. notified attorney,					
07/22/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review client's affidavit					
07/22/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	1.00	\$215.00
Prepare amended motion for default judgment with supplemental documents and evidence for submission to court					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$496.50
Current Amount Due	\$496.50
Previous Balance	\$8,449.00

Invoice Date
08/21/2020

Invoice Number
██████████

Mackie Wolf Zientz & Mann, P.C.
14160 Dallas Pkwy Ste. 900
Dallas, TX 75254
Phone: (214) 635-2650
Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
1Mortgage Way
Mail Stop SV-22
Mt. Laurel, NJ 08054

Loan No: ██████████

Reference:

Property Addr: 7505 LEADING OAKS STREET
LIVE OAK, TX 78233
Our File: 18-001136-670-2

MWZM Case No.: 18-001136-670-2; Loan Type: CONV; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
08/07/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review status of litigation and prepare case notes for next steps.					
08/10/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Attention to completing correspondence regarding Judge's request and preparing amended judgement.					
08/10/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Prepared exhibits in support of Amended Motion for Default.					
08/11/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review documents prepared for filing.					
08/12/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared Amended Motion for default for federal filing.					
08/12/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review military and bankruptcy search results.					
08/14/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review status of litigation and prepare case notes for next steps.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$276.50
Current Amount Due	\$276.50
Previous Balance	\$8,945.50
Payments Received	\$8,945.50
Total Amount Due	\$276.50

Invoice Date
09/15/2020

Invoice Number
[REDACTED]

Mackie Wolf Zientz & Mann, P.C.
14160 Dallas Pkwy Ste. 900
Dallas, TX 75254
Phone: (214) 635-2650
Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
1Mortgage Way
Mail Stop SV-22
Mt. Laurel, NJ 08054

Loan No: [REDACTED]

Reference:

Property Addr: 7505 LEADING OAKS STREET
LIVE OAK, TX 78233
Our File: 18-001136-670-2

MWZM Case No.: 18-001136-670-2; Loan Type: CONV; Case Type: Litigation; Filing Date: NO; Chapter: NO

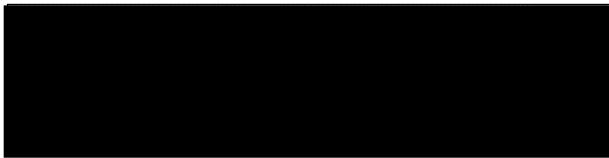
BILLING SUMMARY:

HOURLY FEES					
DATE	FEES DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
08/12/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Requested military and bankruptcy search results.					
08/27/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review status of amended final judgment.					
09/14/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review notice of entry of judgment					
09/14/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review executed order granting final judgment.					
09/15/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.40	\$86.00
Draft motion for attorney's fees.					
09/15/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review order granting default judgment					
09/15/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Draft declaration for attorney's fees					
09/15/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Prepare closing memorandum for submission of file to foreclosure					
09/15/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Combined exhibits in support of Motion for attorney's fees.					
09/15/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.60	\$57.00
Prepared draft Motion for attorney fees, proposed order prior to filing with the court.					

09/15/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared correspondence to parties regarding Motion for Attorney Fees					
09/15/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Review and prepared matter for closing and submit it to foreclosure to proceed.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$562.50
Current Amount Due	\$562.50
Payments Received	\$9,222.00
Total Amount Due	\$-8,659.50



Invoice # [REDACTED]

Invoice Date: 09/15/2020

Loan No: [REDACTED]

Reference:

Property Addr: 7505 LEADING OAKS STREET

LIVE OAK, TX 78233

Our File: 18-001136-670

BILLED CASE SUMMARY SINCE INCEPTION	
FEES	\$0.00
EXPENSES	\$679.00
TIME	\$9,105.50
TOTAL	\$9,784.50

Thank you for the opportunity to be of service.

Please contact invoicing@mwzmlaw.com for any questions or concerns regarding items on this invoice.